



The Law Firm of Robert Moore, PLLC

October 7, 2021

MEMO ENDORSED

VIA ECF

Honorable Sidney H. Stein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Jason Rhodes
18-CR-887 (SHS)

Dear Judge Stein,

I along with Patrick Joyce represent Defendant Jason Rhodes ("Defendant") in this matter. We write to respectfully request that the Court modify Mr. Rhodes's bail conditions to permit him to travel to Rhode Island from October 8, 2021 to October 13, 2021, so that he may attend his daughter's hockey tournament. This Court has permitted Mr. Rhodes to travel numerous times, and he travelled and returned every time without incident.

Probation (through USPO Winter Pascual) has no objection to this request. I tried to get the Government's position on October 5, 2021, but received an email that AUSA Jared Lenow was out of the office. My phone call today went to his voicemail. Notwithstanding same, in the past the Government has stated that if Probation does not object it will not object, and as to the last travel request, the Government stated it had no position.

Respectfully submitted,

Robert Moore

Request granted.

CC: **VIA ECF**
AUSA Jared Lenow

Dated: New York, New York
October 7, 2021

SO ORDERED:

A handwritten signature in blue ink that reads "Sidney H. Stein".

Sidney H. Stein, U.S.D.J.